

Exhibit 1

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1 A. No. She currently stays with my aunt.
 2 Q. Okay. So, Ms. [REDACTED] in the lawsuit
 3 that brings us here today, you have -- I'm going to
 4 call my client United Inn.
 5 Okay?
 6 You have sued United Inn concerning
 7 allegations that you were trafficked for sex at
 8 United Inn; is that correct?
 9 A. Correct.
 10 Q. Okay. And just to confirm what I -- what
 11 I think is the case, your lawsuit involving Stone
 12 Mountain Inn & Suites, did you, in that lawsuit,
 13 contend that you were trafficked for sex at Stone
 14 Mountain Inn & Suites?
 15 A. Yes, ma'am.
 16 Q. Okay. Is there anyplace else, other than
 17 United Inn and Stone Mountain Inn, where you have
 18 been trafficked for sex?
 19 A. No, ma'am. I mean, it was another hotel,
 20 but I can't think of the name of the hotel because it
 21 was a day -- it was like one day.
 22 Q. One day?
 23 A. Yes, ma'am.
 24 Q. Any others?
 25 A. No, ma'am.

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1 Q. Okay. The one other hotel that you --
 2 you are saying you can't remember the name of it; is
 3 that right?
 4 A. Yes, ma'am.
 5 Q. Okay. Do you know where that hotel is
 6 located?
 7 A. Yes, ma'am. It was on Memorial Drive as
 8 well.
 9 Q. Okay. If you drove by it, would you
 10 recognize it?
 11 A. Yes, ma'am.
 12 Q. Okay. Do you know how far it is from the
 13 United Inn?
 14 A. It's on the same strip. It's just --
 15 sorry.
 16 Q. That's okay.
 17 A. It's on the same strip. It's just like
 18 further up, like, the street, if that makes sense.
 19 Q. Okay. Is it on the same side of the
 20 street?
 21 A. Yes, ma'am.
 22 Q. Okay. Now, Ms. [REDACTED], I want to ask you
 23 about how it came to be that you were trafficked at
 24 the United Inn.
 25 Okay?

Page 20

1 A. Yes, ma'am.
 2 Q. All right. Can you tell me when is the
 3 first time you were traffic- -- trafficked at United
 4 Inn?
 5 A. An exact date?
 6 Q. If you know it.
 7 A. It was like October 7th or the 8th.
 8 Q. Of what year?
 9 A. 2018.
 10 Q. Had you been trafficked anywhere before
 11 you were trafficked at United Inn?
 12 A. The Stone Mountain Inn.
 13 Q. Okay. So where -- let me back up, then.
 14 Where is the first place you were -- you
 15 were trafficked?
 16 A. The Stone Mountain Inn.
 17 Q. Okay. And when was that?
 18 A. 2018 as well.
 19 Q. Okay. Do you know approximately a date
 20 or a month?
 21 A. Like a couple of months beforehand,
 22 like -- but I'm not sure of the exact.
 23 Q. A couple months before the October of
 24 2018?
 25 A. Yes. Really maybe like the month before

Page 21

1 actually so --
 2 Q. Okay.
 3 A. -- August. July, August, September,
 4 October.
 5 Q. Okay.
 6 A. Yeah, the month before.
 7 THE REPORTER: The month before you
 8 said?
 9 THE WITNESS: Yes, sir.
 10 THE REPORTER: Okay. Thank you.
 11 MS. RICHENS: Yeah, speak up just --
 12 THE WITNESS: Can you not hear me?
 13 MS. RICHENS: No, he -- I can't hear
 14 you very well -- I mean, I can hear you
 15 okay because I am sitting pretty close to
 16 you, but he's -- he's probably having more
 17 trouble hearing you.
 18 So if you don't mind speaking up and
 19 he's not -- he's not picking up the
 20 microphone. That's just for the record.
 21 So...
 22 THE WITNESS: Okay.
 23 BY MS. RICHENS:
 24 Q. All right. So in the -- all right.
 25 So Stone Mountain Inn is the first place

Page 22

1 you were trafficked; right?

2 A. (Witness indicating.)

3 Q. How did that happen? Like, how -- where
4 were you living at that time?

5 A. I was staying in Conyers with my auntie,
6 and I had met a man and, you know, thought we were in
7 a relationship or whatever, and that's how that
8 happened.

9 Q. Okay. And when did you meet this man?

10 A. Like, in August or September of 2018.

11 Q. Okay. And what is this man's name?

12 A. Shaq. Shaq.

13 Q. Shaq?

14 A. Uh-huh.

15 Q. Like S-H-A-Q, Shaq?

16 A. Uh-huh.

17 Q. Is that a nickname, or is that his real
18 name?

19 A. That's his name.

20 Q. Do you know his last name?

21 A. No, ma'am.

22 Q. Okay. And where did you meet Shaq?

23 A. Through Instagram.

24 Q. Okay. And so you met Shaq, and you
25 thought you were in a relationship with him.

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1 And then how did that become you were
2 being trafficked at Stone Mountain Inn?

3 A. Could you reask your question?

4 Q. Sure.

5 How did it go from you were in a
6 relationship with Shaq to you were being trafficked
7 at Stone Mountain?

8 A. Yeah. Like, I thought -- I thought me
9 and Shaq were in a relationship, yes, and he had me
10 working for him. And that's exactly what that was.
11 He just had me working for him, but I'm thinking it
12 was something, you know. I just thought we were in a
13 relationship, but that wasn't that. Like, I can't --

14 That's how it happened. I thought we
15 were in a relationship, and he had me working for
16 him.

17 Q. Okay.

18 A. That's how it happened.

19 Q. Okay. That's what I thought I heard you
20 say.

21 Okay. So when you were -- when you were
22 trafficked at the Stone Mountain Inn, how long were
23 you there? And we're talking about this first time
24 in July of -- July, August, somewhere in there of
25 2018.

Page 24

1 A. I can't recall the exact time, but it is
2 in documents, though. There's police records about
3 it, but I can't recall the exact date right now.

4 Q. Okay. Was it -- I mean, was it a day?
5 Or was it days? Weeks?

6 A. No, it was like weeks. It was weeks.

7 Q. Okay. The -- the third hotel that you
8 said you were trafficked at, at some point on
9 Memorial Drive, not United Inn. I'm talking -- you
10 know the one I'm talking about where you don't
11 remember the name?

12 A. Yes, ma'am.

13 Q. When were you trafficked there?

14 A. The same -- we had ended up leaving the
15 United Inn, and when we left the United Inn, I had
16 went -- I was still with someone else, and we had
17 went to the other hotel, and that was that.

18 Q. So the third hotel was after the United
19 Inn?

20 A. Correct.

21 Q. Okay. So -- so we have determined that
22 you were first trafficked at -- excuse me.

23 At the United Inn on -- you said
24 October 7th or 8th of 2018; correct?

25 A. Correct.

Page 25

1 Q. And -- and how did -- how did you end up
2 there?

3 A. At the United Inn?

4 Q. Yes.

5 A. Through -- through this girl named Kevy
6 that I had met through Shaq.

7 Q. Okay. How do you spell Kevy?

8 A. K-E-V-I-I (sic). K-E-E-V-I (sic).

9 Q. Okay. Something like that?

10 A. Yes, ma'am.

11 Q. You met her through Shaq?

12 A. Correct.

13 Q. Okay. And what happened? How did you
14 end up at the United Inn?

15 A. We went to the United Inn.

16 Q. Okay. For -- for what purpose?

17 A. To work for Shaq.

18 Q. Okay. And do you -- do you know why
19 during this time period you were being trafficked at
20 the United Inn instead of Stone Mountain Inn?

21 A. (Witness unresponsive.)

22 Q. Let me ask you a different question.

23 So you -- you told me, I believe that you
24 had -- you were previously trafficked by Shaq at the
25 Stone Mountain Inn; right?

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1 A. Correct.

2 Q. Then in October, you were trafficked by

3 Shaq at the United Inn; correct?

4 A. Well, no, it wasn't --

5 Q. So is that right, or did I --

6 A. No. I wasn't trafficked by Shaq at the

7 United Inn. It was two other men. But my first time

8 going to the United Inn, it was through somebody I

9 met through Shaq. That's how I ended up there.

10 Q. Okay.

11 A. And we were working for Shaq, but he

12 wasn't my actual trafficker at the United Inn.

13 Q. Okay. When you say you -- you were

14 working for Shaq, what does that mean?

15 A. Making money for him.

16 Q. Okay. But -- so I thought you -- I

17 thought I just heard you say when you got -- when you

18 first went to the United Inn, you were working for

19 Shaq, but you weren't being trafficked by him; is

20 that right?

21 Is that what you said?

22 A. No, that's not what I said.

23 Q. Okay. I'm sorry.

24 A. I said -- I said Shaq wasn't my two

25 traffickers, because you're trying to say, like, Shaq

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1 was my trafficker at the United Inn.

2 Q. Okay.

3 A. He wasn't. It was two other men.

4 Q. Okay.

5 A. But my first time going, it was to make

6 money for Shaq, but Shaq wasn't with us at the time.

7 Shaq had just got locked up.

8 Q. Okay.

9 A. That's why this girl had came on his

10 behalf.

11 Q. Okay.

12 A. But he wasn't present, you -- if that

13 makes sense, because he was locked up.

14 Q. It does make sense. It does make sense.

15 A. So...

16 Q. Thank you.

17 A. Yes, ma'am.

18 Q. Okay. Now, so was it -- was it Kevy who

19 took you to the United Inn?

20 A. Yes, ma'am.

21 Q. Okay. You didn't choose the United Inn?

22 A. No, ma'am.

23 Q. Okay. Were you ever at the United Inn

24 for anything other than trafficking?

25 A. No, ma'am.

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1 Q. Okay. Now, what are the names of the two

2 men that you said you were trafficked by at United

3 Inn?

4 A. Cash and King.

5 Q. Cash?

6 A. Uh-huh.

7 Q. C-A-S-H.

8 And King --

9 A. Uh-huh.

10 Q. -- K-I-N-G?

11 A. K-I-N-G.

12 Q. Okay. Okay. You don't know their real

13 names, or do you?

14 A. One of their names is in the police

15 report as well, but I can't think of it by heart.

16 And the other one, I just never got his real name.

17 Q. Okay. Which one -- if you know, which

18 one's real name is in the police report?

19 A. Cash.

20 Q. Okay. All right.

21 And -- and so you met Cash and King

22 though Kevy?

23 A. No. So I met them around the -- at the

24 hotel. So Kevy -- the same day that Kevy had took me

25 to the hotel, she had ended up leaving for something.

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1 Something had happened, and she left, and she didn't

2 come back, and I was still at the room. They left me

3 at the room.

4 So the next day, the following day,

5 they're -- you know, like, it's time to check out the

6 room. I didn't have nowhere to go at the time, so

7 I'm trying to get in contact with the girl who

8 dropped me off, and I had ended up meeting King.

9 That's when I had met King at the hotel.

10 Q. So you met Cash and King at the hotel?

11 A. Correct.

12 Q. And you went to the hotel to be sex

13 trafficked; is that --

14 A. No.

15 Q. Okay. Why did you go to the hotel?

16 A. Because Kevy said Shaq wanted us to go to

17 the hotel, so I am listening to what they're saying.

18 Q. Okay. But did you understand that's why

19 you would be going there?

20 A. Yeah, to work for Shaq. I knew we were

21 about to make money for Shaq, yes, ma'am.

22 Q. Okay. Okay. So tell me about the

23 first -- this first visit to the United Inn, you said

24 it was October 7th or 8th; right?

25 A. Correct.

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023**

<p style="text-align: right;">Page 34</p> <p>1 no, it was November of 2018, like, middle/end of 2 November.</p> <p>3 Q. Okay. All right. And what happened that 4 caused you to leave?</p> <p>5 A. Cash had got arrested.</p> <p>6 Q. Okay. And so you -- you just left the 7 hotel?</p> <p>8 A. So since we didn't get arrested, but we 9 were all in the room, by law they had to serve us, 10 like, the trespassing paper. So after we signed the 11 paper, we had left.</p> <p>12 Q. All right. And where did you -- where 13 did you go after that?</p> <p>14 A. I really don't remember exactly. It was 15 on Memorial Drive, though. It was where Cash had 16 told us to go. Like, he had -- he already knew he 17 was about to get locked up so -- and he told us, 18 like, where to go, like, once he got locked up. 19 So...</p> <p>20 Q. And was this -- was this that third hotel 21 we talked about before, or is it another place?</p> <p>22 A. It's the third hotel, and he sent us to 23 somebody so we went to go, like, stay with them for 24 that night.</p> <p>25 Q. Were you trafficked at that other place</p>	<p style="text-align: right;">Page 36</p> <p>1 A. We had got a ride to United -- this boy 2 named Kimani had took us, and he -- he got us --</p> <p>3 Q. I'm sorry. He took you; is that what you 4 said?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. Okay.</p> <p>7 A. I was with someone else. It was me and 8 some other girls. This boy Kimani had took us to the 9 United Inn and got us a room at the United Inn. And 10 we were there -- I wasn't there that long. It's -- I 11 was the first time. We were there for like three 12 days, maybe even less. Maybe -- well, like, yeah, 13 like, two or three days.</p> <p>14 Q. Two to three days.</p> <p>15 Okay. And who were you -- who were 16 you -- who were you working for during those two to 17 three days?</p> <p>18 A. King.</p> <p>19 Q. King.</p> <p>20 And during the first day, you were -- in 21 October/November, you were working for Cash and King 22 or just --</p> <p>23 A. No, I'm sorry. Could you repeat it? The 24 first --</p> <p>25 Q. Sure. So -- sure.</p>
<p style="text-align: right;">Page 35</p> <p>1 that you're talking about?</p> <p>2 A. Yes, ma'am. I mean, you can say that. 3 It was for a night, but you could -- yes, ma'am.</p> <p>4 Q. Okay. And again, this is the third hotel 5 that's also on Memorial Drive that we talked about 6 before?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. And you were only there for a 9 night?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. Okay. Who -- who was with you at that 12 hotel?</p> <p>13 A. Cash's girl. It was kind of like his 14 girlfriend, I guess you could say. But she was 15 through Cash. A girl Cash had with him.</p> <p>16 Q. Okay. When -- when is the next -- was 17 there another time that you were back at the United 18 Inn & Suites?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. Okay. When was that?</p> <p>21 A. In January.</p> <p>22 Q. January of 2019?</p> <p>23 A. Correct.</p> <p>24 Q. All right. Okay. And how did you end up 25 back at the United Inn?</p>	<p style="text-align: right;">Page 37</p> <p>1 So the first time you were at the United 2 Inn in October and November --</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. -- you were working for Cash and King; is 5 that right?</p> <p>6 A. Yes, ma'am. Not at the same time, 7 though, but in that span of time, yes, ma'am.</p> <p>8 Q. Right.</p> <p>9 Okay. So for part of the time, you were 10 working for Cash; and then part of the time, you were 11 working for King?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. And then when you were back at the 14 United Inn in January for a couple -- two to three 15 days, you were working for King; is that right or?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. And during that period of time, 18 were you -- were you in the same room for those two 19 to three days?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Okay. Okay. And what happened that 22 caused you to leave the hotel in January of 2019?</p> <p>23 A. (Witness unresponsive.)</p> <p>24 Q. Let me ask a different question. 25 What happened that caused you to leave</p>

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1 the United Inn in January of 2019 after you had been
 2 there for two to three days? Why did you leave?
 3 A. I honestly don't even remember.
 4 Q. Okay.
 5 A. But I just know we all had left.
 6 Q. Okay. When you say "all" -- "we all had
 7 left," who are you talking about?
 8 A. I had first went to the United Inn with
 9 like three girls. We were, like, three other girls.
 10 The January time, not the first time, but the January
 11 time when I had went.
 12 Q. Okay. And what are their names?
 13 A. I actually don't remember. We were in
 14 group homes together, though.
 15 Q. Okay. So these three -- so these three
 16 girls that you went -- you're saying you went to the
 17 United Inn with them in the January time period;
 18 right?
 19 A. Correct.
 20 Q. And there are three girls you knew from
 21 group homes?
 22 A. Yeah. We -- we were in a group home
 23 together.
 24 Q. Okay. Tell me when you were in a -- tell
 25 me about the group home that you're talking about.

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1 When were you in a group home?
 2 A. Like, from 2018 all the way to, like,
 3 20- -- from 2018 to 2020, I was in group homes.
 4 Q. How did you end up in a group home
 5 initially?
 6 A. Initially?
 7 Q. Yeah.
 8 A. My auntie wasn't fit to care for me at
 9 the time, and then I just had a child as well. It
 10 was just a lot going on at the time.
 11 Q. Okay. So when -- when would it have been
 12 that you first moved into a group home?
 13 A. I'm not sure, but sometime in 2018.
 14 Q. Okay. Was it before these incidents of
 15 sex trafficking that we're talking about?
 16 A. No. It was actually after the incident
 17 of sex trafficking, yeah.
 18 Q. Okay.
 19 A. Yeah.
 20 Q. So when you -- when you were first
 21 trafficked at Stone -- Stone Mountain Inn & Suites,
 22 you were still living with your -- your auntie?
 23 A. The very first time; correct.
 24 Q. Okay. All right. Okay. And so we
 25 were -- we were talking about where you went after

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1 you left the United Inn in 20- -- January of 2019,
 2 and I think you said you didn't remember.
 3 A. Yeah, I don't recall.
 4 Q. Okay. Did you ever return to the United
 5 Inn?
 6 A. Again, after that?
 7 Q. Yes, ma'am.
 8 A. No, ma'am.
 9 Q. Okay. So there were just two -- two time
 10 periods you were at the United Inn, if I am --
 11 A. Correct.
 12 Q. Okay. One was in October or November of
 13 2018, and the other was in January of 2019?
 14 A. January; correct.
 15 Q. Okay.
 16 A. Could we take a break, though? Like, can
 17 I go to the restroom?
 18 MS. RICHENS: Absolutely.
 19 MR. BOUCHARD: Yes.
 20 MS. RICHENS: Absolutely. Take your
 21 microphone off so you don't pull it.
 22 THE VIDEOGRAPHER: Stand by.
 23 The time is 10:43 a.m. This is the
 24 end of Media No. 1, and we are off the
 25 record.

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1 (Whereupon, the video camera was
 2 turned off.)
 3 (A short recess was taken.)
 4 (Whereupon, the video camera was
 5 turned on.)
 6 THE VIDEOGRAPHER: This is the
 7 beginning of Media No. 2. The time is
 8 10:55 a.m.
 9 We are on the record.
 10 BY MS. RICHENS:
 11 Q. All right. Ms. [REDACTED], so we took a
 12 little break, and we're -- we're back on the record
 13 now.
 14 So thank you for helping me walk through
 15 some of the chronology that we talked about before,
 16 and I'm -- as you might imagine, I'm really going to
 17 be focusing on the time at the United Inn since
 18 that's who I am representing.
 19 So you told me that you -- before you --
 20 before you wound up at the United Inn in October of
 21 2018, you had previously been at the Stone Mountain
 22 Inn; is that right?
 23 A. Correct.
 24 Q. Did you go directly from one to the
 25 other, or did you -- you know, go back to a group